

1 Zoya Kovalenko (BAR NO. 338624)  
13221 Oakland Hills Blvd., Apt. 206  
2 Germantown, MD 20874  
+1 678 559 4682  
3 zoyavk@outlook.com

4 *Attorney for Plaintiff Zoya Kovalenko*

5 LYNNE C. HERMLE (BAR NO. 99779)  
lchermle@orrick.com  
6 JOSEPH C. LIBURT (BAR NO. 155507)  
jliburt@orrick.com  
7 ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
8 Menlo Park, CA 94025-1015  
Telephone: +1 650 614 7400  
9 Facsimile: +1 650 614 7401

10 MARK THOMPSON (Admitted *pro hac vice*)  
mthompson@orrick.com  
11 ORRICK, HERRINGTON & SUTCLIFFE LLP  
51 W 52nd Street  
12 New York, NY 10019  
Telephone: +1 212 506 5000  
13 Facsimile: +1 212 506 5151

14 *Attorneys for Defendants*

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 OAKLAND DIVISION  
18

19 ZOYA KOVALENKO,

20 Plaintiff,

21 v.

22 KIRKLAND & ELLIS LLP, MICHAEL DE  
23 VRIES, MICHAEL W. DE VRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
24 AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., AND MARK FAHEY,

25 Defendants.  
26

Case No. 4:22-cv-05990-HSG (TSH)

**JOINT STATEMENT IN SUPPORT OF  
FILIPPATOS PLLC'S  
ADMINISTRATIVE MOTION TO  
PARTIALLY SEAL FILIPPATOS  
PLLCC'S MOTION TO QUASH  
SUBPOENA OF FILIPPATOS PLLC'S  
BANK RECORDS AND FOR  
PROTECTIVE ORDER AND  
SANCTIONS (DKT NO. 224)**

Pursuant to Civil Local Rule 7-11(b), Plaintiff Zoya Kovalenko and Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, the “Defendants”) respectfully submit this Joint Statement in Support of Filippatos PLLC’s Administrative Motion to Partially Seal Filippatos PLLC’s Motion to Quash Subpoena of Filippatos PLLC’s Bank Records and for Protective Order and Sanctions (the “Motion to Seal”).

Good cause exists to seal the redactions identified in the Motion to Seal for the reasons stated therein. Declaration of Joseph C. Liburt ISO Joint Motion to Seal (“Liburt Decl.”) ¶ 2. Disclosure of this information would prejudice both Defendants’ and Plaintiff’s interests in this action. *Id.* Less restrictive alternatives to sealing are not available, as Filippatos PLLC has tailored its request to redact only confidential information. Liburt Decl. ¶¶ 2-3.

In light of the foregoing, the parties respectfully request that the Court grant Filippatos PLLC’s Motion to Seal.<sup>1</sup>

Dated: April 28, 2025

JOSEPH C. LIBURT  
Orrick, Herrington & Sutcliffe LLP

By: /s/ Joseph C. Liburt  
Joseph C. Liburt  
Attorneys for Defendants

Dated: April 28, 2025

ZOYA KOVALENKO

By: /s/ Zoya Kovalenko  
Zoya Kovalenko  
Attorney for Plaintiff Zoya Kovalenko

<sup>1</sup> In accord with Civil Local Rule 7-11(b), the parties hereby adopt Filippatos PLLC’s amended proposed order granting its Motion to Seal, with the exception of the misspelling of the Honorable Judge Hixson’s name. Dkt. No. 225.

**Attestation Re Electronic Signatures**

I, Joseph C. Liburt, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 28, 2025

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/s/ Joseph C. Liburt

Joseph C. Liburt